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Seattle WA

FM SEPARATION STUDY

| Job Title :KMJY(FM) Newport Channel 283C3 (104.5 MHz) | | | F | CC DR Da | ta · 06. | /23/98 |
|--|------------------------|-----------------------|---------------------------------------|--------------------------|----------------------------|-------------------|
| Call City Status State FCC File No | Channel Freq. | ERP(kW) HAAT(m) | Latitude Longitude | Bearing deg-Tru | Dist. (km) | Req. (km) |
| KDRKFM Spokane LIC WA BLH7372 | 229C 93.7 | 56. 725.0 | 47-34-13 117-05-00 | 183.5 | 65.73 34.73 | 31 CLEAR |
| KNJY Spokane LIC WA BMLH900123KB *To channel 280C2 per D90- Class B1 with respect to C | 103.9 -372-From | 91.0 | 117-31-07 | | 63.07 21.07 | |
| KNJY Spokane CPM WA BMPH970512IH From Channel 280A per D90- Acceped by Canada 950724-S | -103.9 -372. Am | 432.0 ended 970 | 117-17-53 910 | | 9.33 | 56 CLOSE |
| Trail BC | 281B 104.1 | . 0 | 49-06-00 117-42-00 | 335.0 | 115.58 31.58 | 84 CLEAR |
| Trail BC Proposed by Canada as Clas allotment limited to 670 w the 235.5 degree azimuth t Commission 971119 | s B 9710. Tatts ERP | 22-Specia and 796m | lly negotian Haat or the | ted, shor e equival | t-space ent alo | ŀď |
| KHTR Pullman LIC WA BLH870112KB | 282C1 104.3 | 24.0 509.0 | 46-48-40 116-54-55 | 176.7 | 150.26 6.26 | 144 CLOSE |
| KZBE Omak CP WA BPH950103MA Proposed as Class B to Can allotment-Accepted by Cana | iada 96071 | 26-Specia | 48-19-12 119-32-18 lly negotiat | 276.4 SS ted, shor | 187.15 70.15 t-space | 117 CLEAR d |
| Stevensville PADD MT RM9292 Canadian concurrence requi | 104.5 | | 46-30-24 114-05-18 | | 288.52 146.52 | |
| KEEH Spokane LIC WA BLH930629KB Proposed as B1 to Canada o negotiated short spaced al | 104.7 n 920306 | 420.0 | 47-34-45 117-17-48 by Canada 9 | | -21.37 | SHORT ' |
| NEW Cranbrook BC Specially negotiated, shor | 104.7 | 1048.0 | 49-27-34 115-37-44 t | 34.9 | 177.40 -17.60 | |

Note:

- * Spacing requirement to KEEH on 285C2 is 56 kilometers
- ** Domestic spacing requirement is 176 kilometers

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Seattle, wA

FM SEPARATION STUDY

| | le :KMJY(FM) Newport | | | | | |
|-------------------------|---|---------------------------|--------------------|-------------------------------------|--------------------|--|
| Channe1 | 283C3 (104.5 MHz) | | | Coordinates | : 48-09 | -37 117-01-49 |
| Call Status | City State FCC File No. | Channel Freq. | ERP(kW) HAAT(m) | Latitude Longitude | Bearing deg-Tru | Dist. Req. (km) |
| Specia | Cranbrook BC 1ly negotiated, shor | 284C 104.7 t-spaced | .0 allotmer | 49-27-34 115-37-44 t-Accepted | 34.9 Dy Commi | 177.40 195 -17.60 SHORT ssion 940902 |
| CHIMFM | Kelowna BC | 284C 104.7 | 36. DA 115.0 | 49-46-06 119-29 - 59 | | 254.32 195 59.32 CLEAR |
| LIC Specia Falls, | Newport WA BLH930823KG lly-negotiated chanr BC on channel 285A 921013 | 104.9 el ltd. | -12.0 6.9 kw ER | 117-01-49 P at 100m H/ | AAT towa | -42.00 SHORT rds Bonnington |
| LIC | Coeur d'Alene ID BLFT880830TB ATOR FOR KRFAFM, MOS | 104.9 | .050 DA 663.0 | | | 55.76 0 .00 TRANS |
| | Bonnington Falls BC | 285A 104.9 | . 0 | 49-28-00 117-30-00 | | 149.33 64 85.33 CLEAR |
| KVTY CP | Lewiston ID BPH931222MA | 286A 105.1 | 0.50 335.0 | 46-27-33 117-02-18 | 180.2 | 189.13 42 147.13 CLEAR |

^{**} End of separation study for channel 283C3 **

Seattle, WA

FM SEPARATION STUDY

| | le :KEEH Spokane, Wa 284A (104.7 MHz) | | | | ·CC DR Da. | Buffer 100 km te : 06/23/98 -45 117-17-48 |
|-------------------------|---|---------------------------|-----------------------------|--------------------------------------|----------------|---|
| Call | City State FCC File No. | Channel | ERP(kW) | Latitude | | Dist. Req. (km) (km) |
| KCLKFM LIC | Clarkston WA BLH831227AC | 231C 94.1 | 100. 376.0 | 46-27-27 117-06-03 | 173.1 | 125.59 29 96.59 CLEAR |
| | Trail BC | 281B 104.1 | . 0 | 49-06-00 117-42-00 | 350.2 | 171.74 69 102.74 CLEAR |
| KHTR LIC | Pullman WA BLH870112KB | 282C1 104.3 | 24.0 509.0 | 46-48-40 116-54-55 | 161.2 | 90.16 75 15.16 CLOSE |
| PADD Canadi | Stevensville MT RM9292 an concurrence requi | 283A 104.5 red | . 0 | 46-30-24 114-05-18 | 114.9 | 271.42 72 199.42 CLEAR |
| Propos | Spokane WA BLH930629KB ed as B1 to Canada c ated short spaced al | n 920306 | -Accepted | 47-34-45 117-17-48 d by Canada | .0 920602-S | .00 115 -115.00 SHORT pecially |
| NEW Specia | Cranbrook BC lly negotiated, shor | 284C 104.7 t-spaced | 1.26 1048.0 Lallotmer | 49-27-34 115-37-44 nt | 29.8 | 242.69 247 -4.31 SHORT |
| Specia | Cranbrook BC lly negotiated, shor | 284C 104.7 t-spaced | .0 I allotmer | 49-27-34 115-37-44 nt-Accepted | | 242.69 247 -4.31 SHORT ssion 940902 |
| KCMB LIC | Baker OR BLH880719KB | 284C 104.7 | 100. 532.0 | 45-07-26 117-46-48 | 187.9 | 275.45 226 49.45 CLEAR |
| CHIMFM | Kelowna BC | 284C 104.7 | 36. DA | 49-46-06 119-29-59 | 327.2 | 292.56 247 45.56 CLEAR |
| LIC | Coeur d'Alene ID BLFT880830TB ATOR FOR KRFAFM, MOS | 104.9 | .050 DA 663.0 | | 70.4 | 27.54 0 .00 TRANS |
| LIC Specia Falls, | Newport WA BLH930823KG Nly-negotiated chann BC on channel 285A 921013 | 104.9 nel 1td | -12.0 6 9 kw El | 117-01-49 RP at 100m | HAAT towa | 67.63 72 -4.37 SHORT rds Bonnington epted by |

Seattle, WA

FM SEPARATION STUDY

| | le :KEEH Spokane, Wa | | | nse Sep F Coordinates | aration E CC DB Dat | te : 06/ | /23/98 |
|----------------|---|------------------|-------|-----------------------------|------------------------|------------------|--------------|
| Channel | 284A (104.7 MHz) | | (| Joordinates | : 4/-34- | -40 11/- | -17-40 |
| Call Status | City State FCC File No. | Channel Freq. | | Latitude Longitude | Bearing deg-Tru | Dist. (km) | Req. (km) |
| LIC | Lewiston ID BLFT930623TA ator KGTS, College P | 104.9 | 617.C | 46-27-29 117-06-01 | | 125.54 .00 | |
| PADD | Moses Lake WA RM9269 ed as Class C1 to Ca | 104.9 | . U | 47-06-09 119-14-26 | 250.8 | 156.18 23.18 | 133 CLEAR |
| KVTY CP | Lewiston ID BPH931222MA | 286A 105.1 | | 46-27-33 117-02-18 | 171.0 | 126,06 95.06 | |
| | Trail BC | 287A 105.3 | . 0 | 49-05-26 117-49-08 | | 172.47 130.47 | |

^{**} End of separation study for channel 284A **

·Seattle. WA

FM SEPARATION STUDY

| Job Title :KEEH Spokane, | | | F- | CL DE DAI | - 467 | 7.11.70 |
|---|-------------------------------|---------------------------|-----------------------|--------------------|------------------|--------------|
| Channel 285C2 (104.9 MHz) | | · · | Coordinates | : 47-34 | -45 117- | 17-48 |
| Call City Status State FCC File N | Channel o. Freq. | ERP(kW) HAAT(m) | Latitude Longitude | Bearing deg-Tru | Dist. (km) | Req. (km) |
| K285EC Lewiston LIC ID BLFT930623T Translator KGTS. College | A 104.9 Place, WA | 617.0 | 11/-06-01 | | .00 | TRANS |
| KWIQFM Moses Lake PADD WA RM9269 Proposed as Class C1 to | Sanada 300 | 1013 | | | 156.18 -67.82 | 224 SHORT |
| Bonnington Falls BC | 285A 104.9 | . 0 | 49-28-00 117-30-00 | 356.0 | 210.43 | |
| KKRV Wenatchee LIC WA BLH910626K Specially negotiated sho | 285C2 B 104.9 rt-spaced | 6.1 403.0 allotment | 47-28-44 120-12-49 | 268.2 | 219.94 29.94 | 190 CLEAR |
| KKRV Wenatchee PDEL WA RM9269 | 285C2 104.9 | . C | 47-28-44 120-12-49 | 268.2 | 219.94 29.94 | 190 CLEAR |
| KVTY Lewiston CP ID BPH931222M | 286A A 105.1 | 0.50 335.0 | 46-27-33 117-02-18 | 171.0 | 126.06 20.06 | |
| Osoyoos BC | 286B 105.1 | . C | 49-06-00 119-34-45 | 315.9 | 239.23 75.23 | 164 CLEAR |
| Trail BC | 287A 105.3 | . 0 | 49-05-26 117-49-08 | 347.3 | 172.47 94.47 | 78 CLEAR |
| K288CV Quincy, etc. LIC WA BLFT851227T TRANSLATOR FOR KTRJ, EPH | 288D A 105.5 RATA, WA | . 048 468 . 0 | 47-19-09 119-47-57 | 262.2 | 190.95 | 0 TRANS |

^{**} End of separation study for channel 285C2 **

Note:

^{*} Counterproposal would eliminate substitution

Seattle, WA

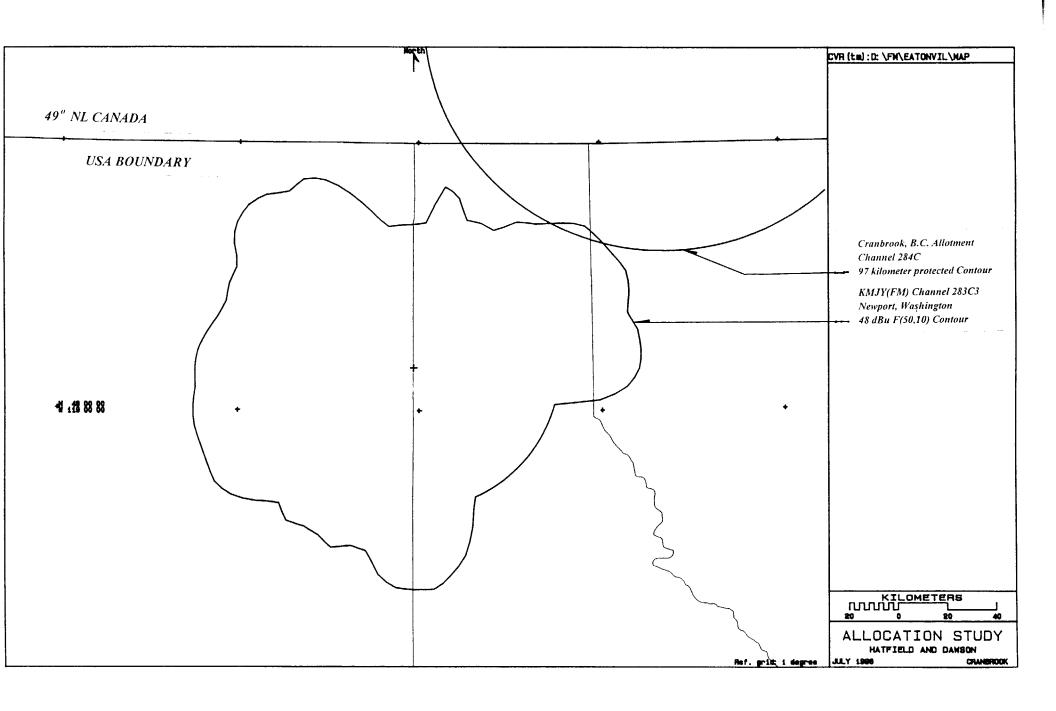
FM SEPARATION STUDY

| Job Title :KEEH Spokane. Wa | | | F1 | т пв пат | : P : Uh/ | 2.37.98 |
|--|----------------------------------|----------------------------|---------------------------------------|----------------------|-----------------------------|-----------------------|
| Channel 285C2 (104.9 MHz) | | (| Coordinates | : 47-34- | 45 117- | 17-48 |
| Call City Status State FCC File No. | Channel E Freq. H | ERP(kW) HAAT(m) | Latitude Longitude | Bearing deg-Tru | Dist. (km) | Req. (km) |
| KCLKFM Clarkston LIC WA BLH831227AC | 231C 1 94.1 3 | 100. 376.0 | 46-27-27 117-06-03 | 173.1 | 125.59 90.59 | |
| NEW-T Bonners Ferry APP ID BPFT971022TG Translator for KMBI, Spoka Horizontal Polarizaton Onl | 94.3 12 ne, WA | .005 256.0 | 48-36-37 116-15-24 | 33.6 | 138.38 | 0 TRANS |
| KHTR Pullman LIC WA BLH870112KB | 282C1 2 104.3 5 | 24.0 509.0 | 46-48-40 116-54-55 | 161.2 | 90.16 11.16 | 79 CLOSE |
| KEEH Spokane LIC WA BLH930629KB Proposed as B1 to Canada o negotiated short spaced al | n 920306- <i>F</i> | 0.32 420.0 Accepted | 47-34-45 117-17-48 by Canada S | .0 - 920602-Sp | .00 106.00 pecially | 106 SHORT ' |
| NEW Cranbrook BC Specially negotiated, shor | 284C 1 104.7 10 t-spaced a | 1.26 048.0 allotment | 49-27-34 115-37-44 | 29.8 | 242.69 33.69 | 209 CLEAR |
| Cranbrook BC Specially negotiated, shor | 284C 104.7 t-spaced a | .C allotment | 49-27-34 115-37-44 t-Accepted b | 29.8 by Commis | 242.69 33.69 ssion 94 | 209 CLEAR -0902 |
| KCMB Baker LIC OR BLH880719KB | 284C 1 104.7 5 | 100. 532.0 | 45-07-26 117-46-48 | 187.9 | | |
| CHIMFM Kelowna BC | 284C 104.7 | 36. DA L15.C | 49-46-06 119-29-59 | 327.2 | 292.56 83.56 | 209 CLEAR |
| K285DX Coeur d'Alene LIC ID BLFT880830TB TRANSLATOR FOR KRFAFM, MOS | 104.9 6 | ,050 DA 563.0 | 47-39-42 116-57-05 | 70.4 | 27 . 54 . 00 | 0 TRANS |
| KMJYFM Newport LIC WA BLH930823KG Specially-negotiated chann Falls. BC on channel 285A Canada 921013 921013 | elita 6. | 9 KW ERF | o at luum HA | 4AI towar | as Rour | nngton |

Note:

^{*} Short-spacing to Cranbrook eliminated

^{**} Spacing requirement to KMJY on 283C3 is 56 kilometers



STATEMENT OF ENGINEER

This Engineering Statement has been prepared on behalf of Pioneer Broadcasting Company, Inc. All representations contained herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield and Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 8th day of July, 1998.



Benjamin F. Dawson III, P.E.

ATTACHMENT B

Pioneer Broadcasting Company Inc

Company, Inc. 1326 Fifth Avenue, Suite 540 • Seattle, WA 98101 • (206) 628-3121 • FAX (206) 628-0118

July 7, 1998

Peter A. Casciato 8 California Street Suite 701 San Francisco, CA 94111

RE: Eatonville, WA FCC Filing

Dear Peter.

Pioneer's Washington Division Manager has provided me the attached estimate of costs relating to the 104.9 KKRV and 100.3 KWIQ frequency switch. The "Downtime" losses and the "Loss of Market Share" losses are, of course, estimates but, I believe, very fair and conservative estimates.

The "Collateral" and "Promotional" costs included are as close to "actual" as we can get as they are based on recent expenditures (mostly in 1998) for these categories.

Under the headline "Re-Marketing Campaign", we have availed ourselves of the services of Steve Dahl and Associates, a respected full service advertising and public relations firm. Dahl has offices in Yakima, Washington and San Diego, California. Steve Dahl and Associates Yakima has a solid understanding of what it takes to accomplish our "Re-Marketing" in Eastern Washington.

Peter, the sum total of the above categories comes to \$178,350.

FORECAST OF COSTS RELATED TO 104.9-KKRV/100.3-KWIQ FREQUENCY SWITCH

as of July 8, 1998

DOWNTIME:

It is estimated that the proposed frequency switch result in KKRV being off the air for 3 days and KWIQ off air for 3 days. Both stations measure the 5am-8pm "TAP" period for means of inventory control. Both stations program formats that result in 208 units during this period each day. Very conservative estimates would allow for 90% selldown at a \$12 per spot average rate in on KKRV and the same on KWIQ. This formula would forecast a loss of \$2,250 per day on each station.

TOTAL COST:

\$ 7,500

KKRV

\$ 7,500

KWIQ

LOSS OF MARKET SHARE:

Both KKRV and KWIQ are in very competitive markets and each has a very active in-format competitor. KKRV competes with KYSN/East Wenatchee. KWIQ competes with KULE-FM/Ephrata. This means downtime during a survey period could result in a very severe financial loss. Listeners would be forced to sample other stations which would cause the survey to indicate loss of market share for our stations. Obviously, the damage resulting from loss of market share is very difficult to project, but a loss of 5% revenue for the six month period until the next survey is complete seems reasonable. This figure would be approximately \$2,800 per month for KKRV and \$2,800 for KWIQ.

TOTAL COST:

\$16,800

KKRV

\$16,800

KWIQ

COLLATERAL EXPENSE:

The collateral packages for both stations would need to be totally redesigned because of the change in frequency. Re-working the logos would be approximately \$1,500 per station. Letterhead, invoices and business cards would be \$1,800 per station (providing a 4-6 month supply). Repainting of building signage would be \$500 per station.

TOTAL COST:

\$ 3,800

KKRV

\$ 3,800

KWIQ

PROMOTIONAL EXPENSE-KKRV:

The highly competitive Wenatchee market requires a significant commitment to promotion so costs in this area would be quite extensive. (KKRV maintains cable TV & billboards 12 months per year)

| Repaint billboards (4) | \$ 2,000 |
|-----------------------------------|----------|
| Replace location banners (2) | \$ 600 |
| Replace plastic banners on a roll | \$ 1,000 |
| Replace window stickers | \$ 1,400 |
| Replace logoed remote tent | \$ 1,600 |
| Reproduce television ads | \$ 750 |

TOTAL COST:

\$7,350

PROMOTIONAL EXPENSE-KWO:

KWIQ is also very busy promotionally with several significant expenses to be incurred:

| Repaint & relogo station Q-Car | \$ 1,200 |
|-----------------------------------|----------|
| Replace location banners (2) | \$ 600 |
| Replace plastic banners on a roll | \$ 1,000 |
| Replace window stickers | \$ 1,400 |
| Replace logoed remote tent | \$ 1,600 |

TOTAL COST:

\$ 6,800

RE-MARKETING CAMPAIGN:

This area is the most difficult to forecast. Both stations would need aggressive outside media campaigns to eliminate listener confusion and to protect reputation. With no local television available, we generally use outdoor, cable TV and newsprint. Most media consultants believe it takes 12-18 months to educate consumers about a new location. At the same time, it is advisable that a business in a competitive industry spend 8-10% of annual gross on advertising and marketing. For the sake of simply calculation, a conservative, one year campaign based on 8% of revenues seems most appropriate. (Revenue based on formula in DOWNTIME-using 90% sellout 5a-8p Monday through Salurday).

TOTAL COST:

\$54,000

KKRV

\$54,000

KWIQ

pe 3 of 5

Pioneer Broadcasting

Company, Inc.

1326 Fifth Avenue, Suite 540 • Seattle, WA 98101 • (206) 628-3121 • FAX (206) 628-0118

Subtotal 'A' above:

\$178,350.00

As to the technical requirements for this potential change, also attached is the pricing from Pioneer's chief engineer for technical equipment, installation, labor and Washington State sales tax on the project.

Totals for technical:

KKRV Wenatchee: KWIQ Moses Lake

\$30,780.00

74,313.00

Subtotal 'B'

105,093.00

 $\underline{Grand\ Total\ A+B}=$

\$283,443.00

Peter, it is my understanding the FCC will require Barbara J. Geesman to reimburse Pioneer Broadcasting Company, Inc. for these out-of-pocket costs.

As we previously discussed, because of Pioneer's horrendous experience with trying to collect from Geesman in a previous transaction, I have grave doubts as to her financial ability to comply with any order to pay timely, if at all.

Sincerely.

cc:

Richard P. Kale

Chief Executive Officer

Thomas A. Lucas, Esq.

To: Richard Kale, Chief Executive Officer, Pioneer Broadcasting Co., Inc. From: Jay White, Corporate Engineer, Pioneer Broadcasting Co., Inc. Re: KWIQ/KKRV Frequency Swap

July 7th, 1998

Total Down time

I have reviewed all of the details regarding a frequency swap between KWIQ and KKRV. The following is a cost analysis of what the swap will entail.

| <u>KKRV</u> | |
|---|--|
| FM Antenna, 6 bay 1/2 wave spacing RFR, | \$16,000 |
| On site tuning | \$ 2,500 |
| Shipping | \$ 1,000 |
| Antenna installation | \$ 1,000 |
| Transmitter/exciter modification kit | \$ 3,000 |
| Labor for modification (factory crew) | <u>\$ 5,000</u> |
| Sub Total | \$28, 500 |
| Plus sales tax, WA State | \$ 2,280 |
| TOTAL | \$30,78 0 |
| Total Down time | 72 hours |
| | |
| KWIQ | |
| | \$48 ,000 |
| KWIO | \$48,000 \$ 2,500 |
| KWIO FM Antenna, 8 bay I wave spacing High Power | |
| KWIO FM Antenna, 8 bay I wave spacing High Power On site tuning | \$ 2,500 |
| KWIO FM Antenna, 8 bay 1 wave spacing High Power On site tuning Shipping | \$ 2,500 \$ 2,000 |
| KWIO FM Antenna, 8 bay I wave spacing High Power On site tuning Shipping Antenna Installation | \$ 2,500 \$ 2,000 \$ 2,500 |
| KWIO FM Antenna, 8 bay I wave spacing High Power On site tuning Shipping Antenna Installation Transmitter Modification Parts | \$ 2,500 \$ 2,000 \$ 2,500 \$ 6,000 |
| KWIO FM Antenna, 8 bay 1 wave spacing High Power On site tuning Shipping Antenna Installation Transmitter Modification Parts Labor for modification (no factory crew available) | \$ 2,500 \$ 2,000 \$ 2,500 \$ 6,000 \$ 8,000 |
| KWIO FM Antenna, 8 bay I wave spacing High Power On site tuning Shipping Antenna Installation Transmitter Modification Parts Labor for modification (no factory crew available) Sub Total | \$ 2,500 \$ 2,000 \$ 2,500 \$ 6,000 \$ 8,000 \$69,000 |

The antennas of both facilities must be replaced, as neither will accommodate the power level of the other. There is no factory help available for the KWIQ transmitter, and a consulting engineer will need to be hired for the transmitter modification or a new transmitter must be purchased. RFR antenna has been specified to meet RFR/ANSI requirements.

48-72 hours

p& 5 of 5

ATTACHMENT C

MEMORANDUM

FROM: Thomas J. Lucas

RE: Barbara Geesman / Bar-B Broadcasting, Inc.

DATE: June 24, 1998

Barbara Geesman and Bar-B Broadcasting, Inc., provided Matthew N. Clapp, Jr., with a promissory note dated November 12, 1991. Payments of \$800 per month were to be made, with a balloon payment as discussed below at the end of 1994.

Ms. Geesman was notified by letter dated April 27, 1994, that her payments due March 1, 1994, and April 1, 1994, were not made. There had also been previous failures to pay. (For example, Ms. Geesman was notified by letter dated January 8, 1993, that her most recent check was for less than the full amount, and that she was still in default on payments due December 1, 1992, and January 1, 1993.) When Ms. Geesman failed to make the back payments, as well as the payment for May 1, 1994, a follow up letter was sent on May 9, 1994. Payments were finally made on May 18, 1994.

Ms. Geesman was next notified by letter dated June 30, 1994, that her payment due May 12, 1994, was not made, nor was a payment made on June 12. The payment due on July 12, 1994, was also not made. Ms. Geesman was notified by letter dated July 18, 1994, that since the payments for June and July had not been made, the note was in default, and its maturity date accelerated. That meant the entire balance then owing, \$50,438.63, was immediately due and payable.

I received a phone call from attorney Jim Jameson, who called on behalf of Bar-B Broadcasting, Inc., on or about August 5, 1994, offering to pay \$15,000 immediately, followed by four equal monthly payments of interest in principal for the remaining balance. I wrote to Mr. Jameson on August 11, 1994, accepting those terms and providing for Ms. Geesman to formally accept the agreement, which she did, along with a check dated August 15, 1994.

I then again heard from her attorney by letter dated October 11, 1994. Under the prior agreement, Ms. Geesman was to make payments on September 15, 1994, October 15, 1994, November 15, 1994, and December 15, 1994. The payment for September was not made and, presumably because of the upcoming date, the payment for October was not going to be made. Thus, Ms. Geesman once again wanted to revise the terms which she had not met.

I wrote to Mr. Jameson by letter dated October 21, 1994, approving the extension that they had requested, meaning payments would be made on November 1, December 1 and December 15, 1994. A check in the correct amount was received on October 30, 1994. Checks were also received by letter dated November 30, totalling \$16,667. With the checks was a note requesting that one be deposited at that time, but that the second check be held until Monday, December 5. The checks were dated December 1. The deposits were staggered as requested.

Finally, a check in the amount of \$17,264.87 on Joy Broadcasting, Inc., and dated December 15, was received on or about December 15. Again, it was requested that the check not be deposited until the next day, and this request was honored. With these payments, the debt was fully paid.

Based on the above situations, and the difficulties that Mr. Clapp had in pursuing collections from Ms. Geesman and Bar-B Broadcasting, Inc., it is believed that her finances are questionable, and that the reliability of collections from her are uncertain.

DECLARATION OF THOMAS J. LUCAS

I declare that the attached Memorandum was prepared by me on June 24, 1998, and is, to the best of my knowledge, true and correct.

Dated this 9th day of July, 1998, at Seattle, Washington.

Thomas J. Lucas, Attorney

Aiken, St. Louis & Siljeg, P.S.

1200 Norton Building

801 Second Avenue

Seattle, WA 98104

ATTACHMENT D

DECLARATION AND VERIFICATION

Under the penalty of perjury, James Stargel declares as follows:

- Helen Stargel and I are the owners of FM station KMJY, Newport, Washington.
- 2. As the licensee of KMJY, we have joined in the foregoing Joint Counterproposal in Docket No. 98-74.
- 3. All of the facts and information stated in the foregoing Joint Counterproposal pertaining to KMJY are true and correct to the best of my information and belief.

James Stargel

P. O. Box 1740

Oldtown, Idaho 83822

 $\frac{7-10-98}{\text{Date}}$

CERTIFICATE OF SERVICE

I, Donald E. Martin, hereby certify this 13th day of July, 1998, that I have caused a copy of the foregoing document to be served by United States mail with first class postage prepaid upon the following:

Matthew H. McCormick, Esquire
Reddy Begley & McCormick
Suite 350
2175 K Street, N.W.
Washington, D.C. 20037
Counsel for Barbara J. Geesman

Peter A. Casciato, Esquire Suite 701 8 California Street San Francisco, California 94111 Counsel for Pioneer Broadcasting Company

James and Helen Stargel P. O. Box 1740 Oldtown, Idaho 83822

Donald E. Martin